

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

UNITED STATES OF AMERICA,

Plaintiff,

v.

DAVID BELL,

Defendant.

CASE NO: 00-6309-CR-SEITZ

JUDGE: SEITZ

CLARENCE MADDUX
CLERK U.S. DISTRICT CT.
S.D. OF FLA - MIA
02 MAR - 7 H 2: 19

MOTION FOR PERMISSION TO TRAVEL

NOW COMES the Defendant, DAVID BELL, by and through his undersigned counsel, JEFFREY M. HARRIS, and respectfully prays unto this Honorable Court for an Order Granting Permission to Travel to Lake Placid, Florida, for 9 days, and as grounds therefore states the following:

1. The Defendant, David Bell, was indicted on October 24, 2000.
2. The Defendant, David Bell, as since been released on bond which restricts his travel to the Southern District of Florida.
3. The Defendant currently resides in Broward County and would like to travel to Lake Placid, Florida with his wife and 4 children, ages ranging from 4-8 years old. He will be residing at 194 Blue Moon Avenue in Lake Placid, Florida from March 22, 2002, through March 31, 2002. Mr. Bell is also asking for a rescission of the 10:00 p.m. curfew while on vacation.
4. Gavin Churchill, Pre-Trial Services Officer has no objection to this motion.
5. Assistant U.S. Attorney, Brian McCormick, has no objection to David Bell's motion.

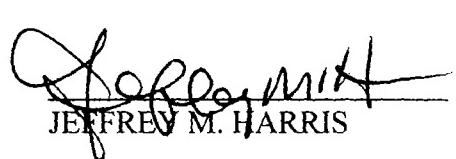
JEFFREY M. HARRIS, P.A.

SUITE 925 • SOUTHTRUST TOWER • ONE EAST BROWARD BOULEVARD • FORT LAUDERDALE, FLORIDA 33301 • TELEPHONE (954) 522-7000

WHEREFORE, the undersigned counsel respectfully prays unto this Honorable Court for an Order Granting Permission to Travel as outlined above and rescission of curfew during this time period.

I HEREBY CERTIFY that a copy of this Motion has been furnished to the U.S. District Clerk of the Court, Federal Courthouse Square, 301 North Miami Avenue, Miami, Florida 33128, Brian McCormick, Esquire, United States Attorney's Office, 500 East Broward Boulevard, Suite 700, Fort Lauderdale, Florida 33394, Gavin Churchill, Pre-Trial Services Officer, 299 East Broward Boulevard, Room 301, Fort Lauderdale, Florida 33301, and to the following list of attorneys this 6 day of March, 2002.

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